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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAROLINA ORTIZ CALDERON,

Petitioner,

V.

POLLY KAISER, *et al.*,

Respondents.

Case No. 3:25-cv-06695-AMO

SUPPLEMENTAL STATEMENT REGARDING JURISDICTION

1 On August 22, 2025, the Court ordered “the Government, by August 29, 2025, to file a
2 supplemental statement no longer than two pages indicating its position on whether the Court would lose
3 jurisdiction over Ortiz Calderon’s habeas proceedings if the Government transferred her out of this
4 District.” *See* Dkt. 23.

5 If habeas jurisdiction is properly established in this District, the Court would not lose jurisdiction
6 if Petitioner were later transferred out of this District. The Supreme Court has held that “when the
7 Government moves a habeas petitioner after she properly files a petition naming her immediate
8 custodian, the District Court retains jurisdiction and may direct the writ to any respondent within its
9 jurisdiction who has legal authority to effectuate the prisoner’s release.” *Rumsfeld v. Padilla*, 542 U.S.
10 426, 441 (2004); *see also Salcedo Aceros v. Kaiser, et al.*, No. 25-CV-06924-RMI (EKL), 2025 WL
11 2453968, at *3 n. 1 (N.D. Cal. Aug. 16, 2025) (citing *Rumsfeld*).

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13 Dated: August 29, 2025

Respectfully submitted,

14 CRAIG H. MISSAKIAN
United States Attorney

15 /s/ Michael A. Keough
16 MICHAEL A. KEOUGH
Assistant United States Attorney

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